

Patricia B. Tomasco

SBN 01797600

Joanna D. Caytas

SBN 24127230

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

3100 McKinnon St, Suite 1125

Dallas, TX 75201

Telephone: 713-221-7000

Facsimile: 713-221-7100

Email: pattytomasco@quinnemanuel.com

Email: joannacaytas@quinnemanuel.com

**PROPOSED COUNSEL TO THE DEBTORS  
AND DEBTORS-IN-POSSESSION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:  RHODIUM ENCORE LLC, <i>et al.</i> , <sup>1</sup>  Debtors.	Bankruptcy Court For The Southern District Of Texas Chapter 11 Case No. 24-90448 (ARP) (Jointly Administered)
WHINSTONE US, INC.,  Plaintiff,  v.  IMPERIUM INVESTMENT HOLDINGS LLC, NATHAN NICHOLS, CHASE BLACKMON, CAMERON BLACKMON, NICHOLAS CERASUOLO, RHODIUM ENTERPRISES, INC., RHODIUM TECHNOLOGIES, LLC, AND RHODIUM RENEWABLES, LLC,  Defendants.	Adv. Pro. No. 24-03065-swe

<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of their corporate identification numbers are as follows: Rhodium Encore LLC (3974), Jordan HPC LLC (3683), Rhodium JV LLC (5323), Rhodium 2.0 LLC (1013), Rhodium 10MW LLC (4142), Rhodium 30MW LLC (0263), Rhodium Enterprises, Inc. (6290), Rhodium Technologies LLC (3973), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Shared Services LLC (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), and Rhodium Renewables Sub LLC (9511). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S  
MOTION TO REMAND**

Defendants Rhodium Enterprises, Inc., Rhodium Technologies, LLC, and Rhodium Renewables, LLC (collectively, “Rhodium,”)<sup>2</sup> submit this opposition (“Opposition”) to *Plaintiff's Motion to Remand* [ECF Nos. 13, 14] and *Plaintiff's Amended Motion to Remand* [ECF Nos. 17 and 18] (as amended, the “Motion to Remand”). For the reasons stated in the *Defendants' Brief in Opposition to Plaintiff's Motion to Remand* filed concurrently herewith, the Court should deny the Motion to Remand or, in the alternative, abate the Motion to Remand while granting the *Defendants' Motion to Transfer Venue* [ECF No. 5 and 6] (“Motion to Transfer”), so the home court of the Debtors, the U.S. Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”), can hear the Motion to Remand in conjunction with closely related matters in the chapter 11 cases of Rhodium and its affiliated debtors (collectively, “Debtors”) styled as *In re Rhodium Encore, et al.*, Case No. 24-90448 (ARP) (Bankr. S.D. Tex. filed August 24, 2024 and August 29, 2024) (the “Chapter 11 Cases”).

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<sup>2</sup> Defendants also include Imperium Investment Holdings LLC (“Imperium”), Nathan Nichols, Chase Blackmon, Cameron Blackmon, Nicholas Cerasuolo (collectively, the “Individual Defendants”).

Respectfully submitted this 9th day of October, 2024.

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

/s/ Patricia B. Tomasco

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*Proposed Counsel to the Debtors and  
Debtors-In-Possession*

**CERTIFICATE OF SERVICE**

I, Patricia B. Tomasco, hereby certify that on October 9, 2024, a true and correct copy of the foregoing document was served through the Court's Electronic Case Filing system of the United States Bankruptcy Court for the Northern District of Texas.

/s/ Patricia B. Tomasco

Patricia B. Tomasco